
Lahontan Regional Water Quality Control Board

November 12, 2014

Page Beykpour
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CONDITIONAL ACCEPTANCE OF SITE INVESTIGATION WORK PLAN FOR CRYSTAL GEYSER ROXANE OLANCHA WATER BOTTLING FACILITY, 1210 SOUTH HIGHWAY 395, OLANCHA, INYO COUNTY

Lahontan Regional Water Quality Control Board (Water Board) staff has reviewed the October 17, 2014 Site Investigation Work Plan prepared by Geosyntec Consultants on behalf of CG Roxane LLC. The Site Investigation Work Plan (Work Plan) was prepared in response to Water Board Investigative Order No. R6V-2014-0063 (Order). Water Board staff conditionally accepts the Work Plan. CG Roxane LLC may proceed with implementing Phase 1 of the Work Plan in accordance with the conditions specified, below. Additionally, see the comment following the conditions.

Work Plan Summary

The Work Plan proposes to perform the investigation in two phases. Phase 1 will include the sampling and analyses of six (6) waste stream discharges from the following sources: East (percolation) Pond, Arsenic Pond, Fire Pond, the discharge stream going to the East Pond, the discharge stream going to the Fire Pond, and overflow from the Fire Pond. Phase 1 also includes drilling and sampling a total of nine (9) direct-push/hydropunch borings near the three wastewater ponds at the site (three borings are proposed near the Arsenic Pond, three near the East Pond, and three near the Fire Pond). A letter report summarizing Phase 1 results and proposing locations for a minimum of three groundwater monitoring wells to be installed and sampled as part of Phase 2 will be prepared and submitted for Water Board staff review. The actual number and locations of groundwater monitoring wells will be determined based on Phase 1 results. Phase 2 will include drilling, installing, and sampling the groundwater monitoring wells identified in the Phase 1 letter report, as accepted by Water Board staff.

Conditions

1. The Work Plan provides no response to Order Requirement B.4:

“Proposed methodologies/activities to provide... information regarding past and current waste (solid and liquid) discharges to onsite facilities/sites other than the three existing pond facilities”.

Provide the required information identified by Order Requirement B.4 in a Work Plan Supplement by **November 21, 2014**. Phase 1 implementation may begin prior to submitting the Work Plan Supplement.

2. The Work Plan, in part, currently includes sampling and analyses of discharge streams going to the East Pond and to the Fire Pond. The Work Plan does not include sampling and analyses of the discharge stream going to the Arsenic Pond. Include sampling and analyses of the discharge stream going to the Arsenic Pond as part of Phase 1.
3. Include one additional direct-push/hydropunch boring at the Fire Pond Outfall location, and conduct the same sampling and analyses for the additional boring that is identified for the nine direct-push/hydropunch borings already proposed.
4. Notify Water Board staff in the South Lake Tahoe (Lisa Scorable) and Victorville (Patrice Copeland) offices a minimum of 72 hours prior to commencing Phase 1 field investigation activities.
5. All necessary permits and clearances shall be obtained prior to initiation of field drilling activities.

Comment

The text describing proposed well installation, construction and materials (e.g., screen slot size, length of screened interval, etc.) differs slightly between that on page 13 and that in the Sampling and Analysis Plan, Appendix C. Water Board staff expects the inconsistencies to be addressed/clarified in the Phase 1 letter report, which will be submitted for Water Board review and acceptance prior to implementing Phase 2.

Please be advised that additional investigation may be necessary based upon the nature of the information provided in the Work Plan Supplement that is due by November 21, 2014. Additionally, Water Board staff is reviewing the Facility Waste Generation and Discharge Systems Report, received on October 21, 2014, and will provide comments under separate cover.

Water Board staff looks forward to CG Roxane LLC implementing the Site Investigation Work Plan and submitting the Phase 1 letter report and subsequent Site Investigation Report. Please contact Lisa Scorable at (530) 542-5452 or lisa.scorable@waterboards.ca.gov, or Scott Ferguson at (530) 542-5432 or scott.ferguson@waterboards.ca.gov, if you have any questions.



Lauri Kemper, P.E.
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LAS/dk/T: CG Roxane Olanca Site Inv WP Acpt Ltr
File Under: Pending: Crystal Geyser Olanca Facility, (Inyo Co.)